

EXHIBIT A

Undertaking of Receiver Pursuant to July 14, 2022 Order

(Attached)

**UNDERTAKING OF RECEIVER
PURSUANT TO JULY 14, 2022 ORDER**

Michael Fuqua, as court-appointed receiver (the “Receiver”) for Theia Group, Inc., Theia Aviation LLC, and Theia Holdings A, Inc. (collectively, the “Receivership Entities”), respectfully submits this *Undertaking* on behalf of himself, as Receiver, and the Receivership Entities, in accordance with the *Order* (the “July 14 Order”; Doc. 270) entered by the United States District Court for the Southern District of New York (this “Court”) on July 14, 2022, and represents as follows:

1. This undertaking relates to (i) the *Motion of Stephen Buscher for an Order to Lift the Receivership Stay* (the “Lift Stay Motion”; Doc. 250), (ii) the *Expedited Motion of Receiver for an Order Further Extending the Stay Provided in the Receivership Order* (Doc. 258), and (iii) the July 14 Order.

2. I have received and reviewed a copy of the July 14 Order.

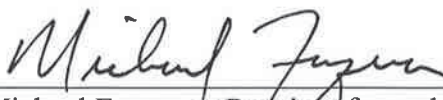
3. On behalf of the Receivership Entities and myself, in my capacity as Receiver, in accordance with the Court’s directives set forth in the July 14 Order, I hereby undertake to preserve all documents relating to Mr. Buscher’s proposed claims.

4. I hereby further undertake, on behalf of the Receivership Entities and myself, in my capacity as Receiver, not to assert the statute of limitations or laches to any claim asserted in Exhibit 2 to the Buscher Declaration of June 20, 2022 (Doc 252) under any stay or extension of a stay ordered by this Court.

Dated: July 19, 2022

Respectfully submitted,

By:


Michael Fuqua, as Receiver for and on behalf of
Theia Group, Inc., Theia Aviation LLC, and
Theia Holdings A, Inc.